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Attorneys for Plaintiffs **UNIVERSAL PARAGON CORPORATION and SUNQUEST PROPERTIES, INC.**

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNIVERSAL PARAGON CORPORATION,
 a Delaware corporation, and **SUNQUEST**
PROPERTIES, INC., a California corporation,

Plaintiffs,

v.

INGERSOLL-RAND COMPANY LIMITED, a
 Bermuda corporation; **INGERSOLL-RAND**
CORPORATION, a New Jersey corporation;
SCHLAGE LOCK COMPANY, a California
 corporation; and **TOUCH-PLATE**
INTERNATIONAL, INC., a California
 corporation,

Defendants.

CASE NO. C 05-03100 MJJ

**STIPULATION AND [PROPOSED]
 ORDER RE: CASE
 MANAGEMENT SCHEDULE
 MODIFICATION**


**STIPULATION AND [PROPOSED] ORDER RE: CASE MANAGEMENT
 SCHEDULE MODIFICATION**
 Case No. 05-03100 MJJ

WHEREFORE, the Plaintiffs, Universal Paragon Corporation and Sunquest Properties, Inc. (hereinafter referred to collectively as "Plaintiffs"), the Defendants, Ingersoll-Rand Company Limited, Ingersoll-Rand Company, Schlage Lock Company and Touch-Plate International, Inc. (hereinafter referred to collectively as the "Ingersoll-Rand Defendants") and the Counter-Defendant Union Pacific Railroad ("Union Pacific") have mutually agreed to the following modifications of the case schedule and respectfully request that this Court adopt the following schedule.

NOW, THEREFORE, it is hereby stipulated and agreed by the respective parties, by and through their counsel of record:

1. The deadline for depositions is extended to **October 6, 2006**.
2. The deadline for filing discovery motions related to all discovery (depositions or written discovery) is extended to **October 17, 2006**.
3. Designation of Experts is extended to **October 13, 2006**.
4. Expert Reports is extended to **October 27, 2006**.
5. Designation of Supplemental/Rebuttal Experts is extended to **November 3, 2006**.
6. Supplemental/Rebuttal Reports is extended to **November 17, 2006**.
7. Expert Discovery Cut-off is extended to **December 1, 2006**.
8. Deadline for dispositive motions shall be extended to **December 22, 2006**.
9. Settlement Conference shall still be held at 9:30 a.m. on **January 8, 2007** before Magistrate Judge Joseph C Spero.
10. Pre-Trial Status Conference shall still be held at 3:30 p.m. on **January 30, 2007**.
11. Trial shall still begin at 8:30 a.m. on **February 12, 2007**.

Dated: August 22, 2006

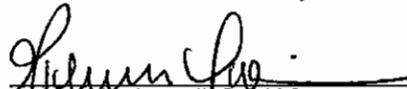

 PHILIP L. GREGORY
 ARON K. LIANG
 Attorney for Plaintiffs Universal Paragon
 Corporation and Sunquest Properties, Inc.

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Dated: August _____, 2006

GREGORY P. O'HARA
LISA A. COLE
Attorneys for Defendants Ingersoll-Rand
Company Limited, Ingersoll-Rand
Company, Schlage Lock Company and
Touch-Plate International, Inc.

Dated: August 22, 2006



MARY ELLEN HOGAN
MICHELLE YOUNKIN
Attorney for Counter-Defendant Union
Pacific Railroad Company

The Court hereby enters an order in conformance with the above stipulation:

Dated: 8/31, 2006


HON. MARTIN J. JENKINS
United States District Court Judge

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3 Dated: August 22, 2006


GREGORY P. O'HARA
LISA A. COLE
Attorneys for Defendants Ingersoll-Rand
Company Limited, Ingersoll-Rand
Company, Schlage Lock Company and
Touch-Plate International, Inc.

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7 Dated: August _____, 2006

MARY ELLEN HOGAN
MICHELLE YOUNKIN
Attorney for Counter-Defendant Union
Pacific Railroad Company

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11 The Court hereby enters an order in conformance with the above stipulation:

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13 Dated: _____, 2006

HON. MARTIN J. JENKINS
United States District Court Judge